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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

FEB 22 2018

AT GREENBELT
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND

DEPUTY

Valene Powell

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

Wheaton WTC Center
Maryland WTC Program

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Complaint for a Civil Case

Case No. PWG 18CV0535
(to be filled in by the Clerk's Office)

Jury Trial: ☐ Yes ☒ No
(check one)

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Valene Powell
Street Address	1424 Stewart Lane, APT # C2
City and County	Silver Spring, Md
State and Zip Code	Maryland, 20904
Telephone Number	240-821-5465
E-mail Address	Snowexena@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	Wheaton, WTC Center
Job or Title (if known)	Maryland WTC Program
Street Address	2730 University Blvd W, Suite #
City and County	Wheaton, MD LL10
State and Zip Code	Maryland 20902
Telephone Number	301-933-6680
E-mail Address (if known)	N/A

Defendant No. 2

Name

N/A

Job or Title

(if known)

Street Address

City and County

N/A

State and Zip Code

Telephone Number

E-mail Address

(if known)

Defendant No. 3

Name

N/A

Job or Title

(if known)

Street Address

N/A

City and County

State and Zip Code

Telephone Number

E-mail Address

(if known)

Defendant No. 4

Name

N/A

Job or Title

(if known)

Street Address

N/A

City and County

State and Zip Code

Telephone Number

E-mail Address

(if known)

(If there are more than four defendants, attach an additional page providing the same information for each additional defendant.)

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

The ADA prohibits discrimination on the disability in public accommodation. It also applies of the United States Congress Law. The WTC did not follow the ADA law.

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, (name) Valene Powell, is a citizen of the State of (name) Maryland.

b. If the plaintiff is a corporation

The plaintiff, (name) N/A, is incorporated under the laws of the State of (name) N/A, and has its principal place of business in the State of (name) N/A.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) N/A, is a citizen of the State of (name) N/A. Or is a citizen of (foreign nation) N/A.

b. If the defendant is a corporation

The defendant, (name) Wheaton WTC Center, is incorporated under the laws of the State of (name) Maryland WTC Program, and has its principal place of business in the State of (name) Maryland. Or is incorporated under the laws of (foreign nation) N/A, and has its principal place of business in (name) N/A.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

WTC do not follow Their law of ADA
we cost \$100,000.00 is more than
\$75,000 also not counting fee at the
court, depend their decide.

02/19/2018

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

My honest have to write this letter with my lost-trusted with WTC.
 On Nov 2017, I wrote the letter & request for an interpreter, since I was frustrated and much patient with them, sometime they provide an ASL interpreter not 100% & most I reminder to tell them for my ASL interpreter. Final the WTC-Manager Julie called me & received the letter, I write, She will do provide ASL interpreter on Dec 2017, I agreed with her for my appt (Jan 18, 2018). Again she called me on Dec 2017, Ask for VRI with Computer, I denied the VRI, I explained her with my bad experience the problems and much misunderstand. She will contact her director about it. Later a few week, she called & leave a message, I got a message I agreed with her, her director approved provide ASL interpreter for my appt Jan 18. On Jan 18, 2018, I went their office on time, I waited for 30 min, the front desk told me ASL interpreter will be here & on way. I was excited forward for this, later the lady said no interpreter today I upset & I

PTO →

I left @ 1pm. They called & leave a message on Jan 18 said the interpreter is very late, I won't reply & said lie. Nice the weather, I believe they did not called Agency & lie. Again they are very ignore me & betray for my request them & waste my time.

On Feb - the WTC Manager Julie called & leave a message, ask me to come for Appt & sorry for me not get an interpreter was late. Sound like Lie & broke their law of ADA. I believe they are discrimination & lie to me. I don't appreciate for their betray to me for no reason. It's not fair for me. WTC not follow their Policy ADA, I don't believe they did not request for interpreter. (Lie) Interpreter only is On time that a Job Always!

PTO →

Feb 13, 2018 - W7C called & leave a message to let me know that they will increase my benefits and bring my two girls to come and call them for an appointment so they did not said about promise for ASL interpreter. I won't call them back, I lost their trust & indeed waste my time. I'm very serious and I strongest they broke their law of ADA period.

(Americans with Disabilities) - ('ADA')
(Women, Infants and Children) - ('WIC')

2/19/2018

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages. For any request for injunctive relief, explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.


WTC is a damage the broke
a law for ADA ^{NOT} provide an
ASL Interpreter.
On Jan 18, 2018. ASL Interpreter
is not office. Broke the law.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 02/19, 2018
Signature of Plaintiff 
Printed Name of Plaintiff Valene Powell

(If more than one plaintiff is named in the complaint, attach an additional certification and signature page for each additional plaintiff.)

B. For Attorneys

Date of signing: _____, 20__.

Signature of Attorney _____
Printed Name of Attorney _____
Bar Number _____
Name of Law Firm _____
Address _____
Telephone Number _____
Email Address _____